

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN DIVISION**

**UNITED STATES OF AMERICA,  
Plaintiff,**

**v.**

**ONE 2003 FREIGHTLINER  
COLUMBIA 120; CL12064ST  
VIN: 1FUJA6CG83LL06596  
Defendant**

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**CIVIL NO. M-15-126**

**COMPLAINT FOR FORFEITURE**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the United States of America, Plaintiff in the above entitled and numbered cause, by and through its United States Attorney for the Southern District of Texas and its Assistant United States Attorney assigned to this matter, and files this Complaint for Forfeiture against **ONE 2003 Freightliner Columbia 12; CL12064ST, VIN: 1FUJA6CG83LL06596**, hereinafter “Defendant Vehicle” and would respectfully show the Court the following:

I.

Jurisdiction is conferred upon this Court by virtue of Title 28, United States Code, Sections 1345 and 1355.

II.

This Court is a proper venue for this matter pursuant to Title 28, United States Code, Section 1395. The Defendant Vehicle is now and will remain in the jurisdiction of this Court during the pendency of this action.

III.

The Defendant Vehicle is within the jurisdiction of the Court having been seized by the Drug Enforcement Administration on October 24, 2014 in Hidalgo County, Texas.

IV.

The Defendant Vehicle was used in the concealment, transportation and attempted delivery of narcotic trafficking proceeds, specifically \$1,413,255.00 United States currency, a violation of Title 18, United States Code, Section 1956(a)(1)(B) and is, therefore, subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(A).

V.

The facts and circumstances supporting the seizure and forfeiture of the Defendant Vehicle are as follows:

On October 23, 2014 at approximately 11 p.m., the titled owner of the Defendant Vehicle, Alejandro Morales-Flores (Morales-Flores), was driving Defendant Vehicle southbound on U.S. Highway 281 from Brooks County into Hidalgo County, Texas when he was pulled over for a traffic violation by Texas Department of Public Safety (DPS) Trooper Miguel Tejeda. The traffic stop was initiated by Trooper Tejeda after he observed Morales-Flores fail to drive the Defendant Vehicle in a single lane of traffic on three separate occasions; He suspected that the driver was fatigued. During the traffic stop, DPS Trooper Tejeda requested and obtained written consent to search the Defendant Vehicle and the shipping container it towed.

DPS Trooper Ricardo Huerta assisted in the search of the Defendant Vehicle and discovered three duffle bags and an Abercrombie store bag underneath the sleeper compartment bed of the Defendant Vehicle. Inside the bags were bundles of United States currency. The bundles contained within the duffle bag were wrapped in grey duct tape. The bundles in the small store bag were wrapped in clear cellophane. The total amount of currency contained within the bags was \$1,413,255.00.

DEA Special Agent Steven Sorensen went to the location of the Defendant Vehicle and assumed custody of the Defendant Vehicle and currency. Morales-Flores was subsequently interviewed by DEA Agent Sorensen in the presence of DPS Trooper Huerta. Under rights advisement and waiver thereof, Morales-Flores stated that he was recruited by a person known to

him as “Primo” to drive the currency from Houston, Texas to the Rio Grande Valley. Morales-Flores was going to be paid \$3000 upon delivery of the currency. He claimed to be unaware of the identity of the ultimate recipient of the currency but knew that it was drug proceeds that he was to deliver. Morales-Flores has been indicted by a federal grand jury in the Southern District of Texas, McAllen Division in criminal cause number 14-CR-1694. The indictment charges Morales-Flores with conspiracy launder narcotic trafficking proceeds.

VI.

By reason of the foregoing, the Defendant Vehicle is subject to an Order of Forfeiture to the United States of America pursuant to Title 18, United States Code, Section 981(a)(1)(A).

**WHEREFORE, PREMISES CONSIDERED,** Plaintiff prays as follows:

1. That Notice of Forfeiture issue according to the normal procedure of the court citing all persons having an interest in the Defendant Vehicle to appear on the return day of said process and make such Claim and Answer as they may have;
2. That a Judgment of Forfeiture be decreed against the Defendant Vehicle;
3. That following a Judgment of Forfeiture, the Defendant Vehicle be disposed of according to law; and
4. For costs of this action, including costs of seizure, and for such additional relief that Plaintiff may show itself entitled.

Respectfully Submitted,

KENNETH MAGIDSON  
UNITED STATES ATTORNEY

BY: S/Mary Ellen Smyth  
MARY ELLEN SMYTH  
Assistant United States Attorney

VERIFICATION

I, Steven D. Sorensen, Special Agent with the Drug Enforcement Administration in McAllen, Texas, declare under penalty of perjury that I am one of the agents responsible for the investigation concerning this litigation. I have read the above Complaint for Forfeiture. Based upon the my investigation and that conducted by other DEA agents and Texas Department of Public Safety State Troopers and my review of that investigation, the information contained in the Complaint for Forfeiture is true and correct and establishes probable cause to seize and forfeit the Defendant Vehicle as set forth therein.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this the 27<sup>th</sup> day of March, 2015.



Steven D. Sorensen, Special Agent  
Drug Enforcement Administration

2/12 SUBSCRIBED and SWORN to before me the undersigned Notary Public on this the 27<sup>th</sup> day March, 2015.

2/12/19

My Commission Expires



Notary Public for the State of Texas



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SOUTHERN DISTRICT OF TEXAS  
McALLEN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ONE 2003 FREIGHTLINER  
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Defendant

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CIVIL NO. M-15-126

**NOTICE OF FORFEITURE ACTION**

Notice is hereby given that an action styled as shown above has been brought by the United States of America, Southern District of Texas, McAllen Division on seeking to forfeit the following:

**ONE 2003 FREIGHTLINER COLUMBIA 120 CL12064ST; VIN: 1FUJA6CG83LL06596**

Said property was seized on October 24, 2015 by the Drug Enforcement Administration agency of the United States of America, in Hidalgo, Texas.

Anyone claiming an interest in this property and wishing to contest this forfeiture action must file a Claim in the above-referenced case within sixty (60) days of the first day of internet publication at [www.forfeiture.gov](http://www.forfeiture.gov) of this action or within thirty-five (35) days of having been sent actual notice of this action or within such time as may be allowed by the Court. The Claim must be verified upon oath or solemn affirmation stating your interest in the property by which you claim a right to defend the forfeiture action; and you must also file an Answer to the Complaint for Forfeiture within twenty-one (21) days after the filing of your Claim, serving copies of both your Claim and Answer upon: The United States of America, c/o U.S. Attorney's Office, Attn: Forfeiting Attorney, 1100 Matamoros, Suite 200, Laredo, Texas 78040, and the U.S. District Clerk, 1300 Victoria St., Suite 1131, Laredo, Texas 78040.

KENNETH MAGIDSON  
UNITED STATES ATTORNEY  
SOUTHERN DISTRICT OF TEXAS

Notice sent: March 30, 2015

Claim due: May 4, 2015